

## **DISCOVERY PLAN WORKSHEET**

(Please be advised that the Court's Individual Rules include additional forms to be used in cases involving claims of adverse employment or FLSA violations.)

### **Tier I Pre-Settlement Discovery**

Deadline for completion of Rule 26(a) initial disclosures  
and HIPAA-complaint records authorizations: \_\_\_\_\_ N/A \_\_\_\_\_

Completion date for Phase I Discovery  
as agreed upon by the parties: \_\_\_\_\_ N/A \_\_\_\_\_  
(Reciprocal and agreed upon document production,  
generally not including depositions, unless otherwise agreed.  
No more than 30 days after Initial Conference)

Status conference TBD by the court: \_\_\_\_\_  
(Generally 15 days post Tier I Discovery)

### **Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings: \_\_\_\_\_ 8/15/20 \_\_\_\_\_  
(Presumptively 15 days post status conference)

First requests for production of documents  
and for interrogatories due by: \_\_\_\_\_ 8/31/20 \_\_\_\_\_  
(Presumptively 15 days post joining/amending )

All fact discovery completed by: \_\_\_\_\_ 12/15/20 \_\_\_\_\_  
(Presumptively 3.5 months post first  
requests for documents/interrogatories )

Exchange of expert reports completed by: \_\_\_\_\_  
(Presumptively 30 days post fact discovery)

Plaintiff to submit its report by 1/15/21  
Defendants to submit their report by 2/15/21

Expert depositions completed by: \_\_\_\_\_ 3/15/21 \_\_\_\_\_  
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice: \_\_\_\_\_ 5/15/21 \_\_\_\_\_  
(Parties are directed to consult the District Judge's  
individual rules regarding such motion practice.  
Presumptively 30 days post expert depositions)

### **COMPLETION OF ALL DISCOVERY BY:**

(Note: Presumptively 9 months after Initial Conference.)

Submission of joint pre-trial order: \_\_\_\_\_ 4/15/21 \_\_\_\_\_

Final Pre-Trial Conference TBD by the court: \_\_\_\_\_